

Public Comment Summary

2013 Proposed Wolf Hunting and Trapping Seasons

Introduction

FWP received comments to proposed 2013 wolf hunting and trapping seasons via the website (survey monkey), email and hard copy mailings. The formal comment period was functionally initiated May 9, 2013 with that day's FWP Commission meeting and adoptions. In addition to a press release calling for public comment, an "interested person" letter generally describing the proposed season and quotas was posted on the website and mailed to an established list of interested parties. In all, over 25,000 comment entries were received through the deadline of 5:00 PM, June 26, 2013. The deadline was moved from June 24 because the FWP website was down during June 23 and 24. Comments reflected diverse perspectives from Montana and other states/countries and included unique inputs as well as common or repeating messages referencing the local, regional and/or statewide scale.

This is not a tabulation of supporting vs. opposing comment numbers (both support and opposition were represented across the total comment set). Rather, this document represents an effort to enumerate rationales and values that *repeatedly* surfaced in public comment (listed here in no specific order). Recognize that solicited comment such as this typically does not provide a representative sample of public opinion. Such samples typically provide a biased view of public opinion. For this reason, it is inappropriate to summarize rates of support and opposition.

As a coarse summary, it is not intended to replace, dismiss or represent all/any comments received and forwarded to the Commission and FWP staff. This summary has been assembled only to assist all parties generally recognize and consider relatively consistent elements of public comment so that those elements at least (along with any others) may be better considered in light of proposal justifications.

Topics and Themes

Wolf Harvest Near Yellowstone National Park

There was comment in opposition to any conservative management on the YNP border. Issues included impacts to big game; State vs. Park management authority, plans, and objectives; opposition to expanding Park boundaries; need to reduce local wolf abundance; loss of elk outfitting revenue; impacts to local economies. Some comments supported more conservative management citing benefits to tourism and research; benefits to local and state economies, and direct benefits to personal income.

FWP Response: FWP agrees that YNP wildlife management goals, objectives, and strategies should not be extended further into Montana. Wolves in Montana are managed within the frameworks and objectives identified and adopted in the Montana Gray Wolf Conservation and Management Plan. FWP also recognizes the value of research and the economic value of wolf watching and other activities associated with wolves along the Park boundary. Similarly, there is recognition of other economic values such as outfitting and hunting, that have been impacted, and continue to be impacted by wolves in YNP and elsewhere.

This issue is largely driven by the harvest of radio-collared wolves during the 2012 season. One of the more common uses of radio collar data is to calculate cause-specific mortality rates, include losses to hunting. In fact, there are multiple scientific publications that provide radio telemetry based estimates of wolf survival and cause-specific mortality in the northern Rocky Mountains. Those estimates are crucial to inform wolf management decisions. It is important that hunters harvest collared animals at the same rates as the entire population to provide unbiased estimates. The concern over biasing wolf survival data is shared by other entities and agencies including the USFWS.

Finally, it is always prudent and necessary to maintain multiple collars in packs to compensate for losses such as hunting mortality, natural mortality and dispersal. If the YNP research program desires to maintain marked packs, it will be necessary to maintain multiple radio-collared wolves in each pack.

Montana Residents vs. Nonresidents

Resident comments commonly supported the proposals and residents often suggested additional measures to liberalize regulations, increase harvests, and decrease wolf abundance. Resident support was strong and fairly consistent. Nonresidents were typically in opposition to the proposed changes and suggested more conservative regulations. In contrast to 2012, there was more nonresident comment in support of more liberal regulations this year. Those nonresidents were often from surrounding states and often cited impacts to big game populations as a justification for more liberal regulations. Residents were commonly supportive of high bag limits, trapping, longer seasons, electronic calls, and hunting over bait while nonresidents often indicated opposition to those elements.

Liberalize Harvest Opportunity and Levels of Harvest

Liberalize harvest opportunity, seasons and licenses to the extent possible; longer seasons; support trapping; include snaring as a means of take; permit baiting; multiple wolves per hunter; yearlong and/or spring seasons; reduce license cost; eliminate quotas; predator status.

FWP Response: FWP intends to comprehensively manage wolves in a manner comparable to other managed species, and in a manner that precludes any reasonable likelihood of a federal status review or relisting. The 2013 proposal incorporates more liberal regulations adopted in 2012 along with longer seasons and increased hunting bag limit.

Trapping

Comments in opposition to trapping were less frequent this year, but fairly common in the nonresident comments. Some comments voiced opposition to trapping suggesting lower bag limits; limitations on public land; and opposition to the use of bait by trappers. Those in support of trapping suggested the proposed 10 pound trap pan tension regulation was not needed or would reduce the effectiveness of trapping. Other comment included longer seasons; authorize snares as a means of take; increase trapping bag limits.

FWP Response: Trapping is recognized as a legitimate means of take for many species in Montana. Furthermore, trapping was recognized as a valid means of take and an eventual element of wolf population management in the Montana Gray Wolf Conservation and Management Plan. In 2012, FWP implemented a number of measures to minimize adverse impacts and potential conflicts with trapping. Among those measures, wolf trappers were required to attend a wolf trapper education course that emphasized ethics and practices to minimize trapping impacts. The minimal nature of conflicts and incidents during the 2012-13 trapping season implies that the wolf trapper education program was effective. Wolf trapper education would also be required in 2013. In addition, FWP proposed extending the setback for ground sets to 300 feet on trails and roads in Regions 1 and 2 that have high recreational use or a history of conflicts.

FWP recognizes that conflicts occur between user groups on public lands. One important view is that while many recreationists enjoy use of public lands year-round, trappers are present for a short time frame during winter when conflicts with other users would typically be diminished. FWP intends to comprehensively manage wolves in a manner comparable to other managed species, and in a manner that precludes any reasonable likelihood of relisting.

Concern over Wolf Hunting, Trapping, and Harvest

Some expressed concern over wolf numbers, distribution and pack structure; opposed hunting and trapping; suggested reduced hunter take; concern over the lack of quotas and potential overharvest that would not be sustainable; suggested slower pace and/or less aggressive approach to liberalization.

FWP Response: One intent of the proposed wolf season is a reduction of the wolf population in response to circumstances that include the current wolf population size, livestock loss and ungulate population levels. The reduction in wolf abundance is intended to be measurable, responsive and consistent with long term maintenance of the species. This proposal is for the 2013 season only. Appropriately, results will be evaluated and incorporated into future management proposals.

Livestock Loss

Concern over livestock loss; hunt to reduce losses to livestock; hunting not a replacement for effective/timely response to livestock loss.

FWP Response: FWP did not intend that this hunting season would remove or fully replace the option of site specific response to livestock depredations. Hunting may assist the resolution of conflicts between wolves and livestock in those situations that overlap the hunting season. A reduction in the wolf population size and/or local wolf presence via hunter harvest has potential to reduce livestock depredations. The 2013 proposal includes a mechanism to enlist private trappers to assist with responses to depredation complaints. This could be a useful strategy to enhance effective and timely responses to depredation events.

Impacts to Big Game Populations

Many expressed concerns over wolf impacts to deer, moose, and elk; hunting opportunity and heritage being lost; manage for balance, may be too late already; more wolves than people

think; hunt to reduce losses to wild ungulates; wolf harvest needs to be big enough to realize a positive impact to wild ungulates.

FWP Response: Specific details of wolf-ungulate relationships on Montana's landscape continue to be measured and incorporated into management decisions. Management intent is a reasoned balance that incorporates all species' long term viability, ecosystem presence and associated values to the extent possible.

Value of Wolves in Ecosystems

Wolf valuable addition to restored ecosystem; let balance develop with less or no hunting; oppose wolf hunting/carnivore hunting/lion hunting; relative small impact to livestock industry

FWP Response: Wolves are a native wildlife species with a contribution to ecosystem function. Specific details of wolf-ungulate relationships on Montana's landscape continue to be measured for continued incorporation into management decisions. Management intent is a reasoned balance that maintains all species' long term viability, ecosystem presence and associated values to the extent possible. Impacts to the livestock industry can be measured at multiple scales and can be significant at the scale of the individual livestock producer.

State Management

Hunting and trapping are appropriate management tools; manage like other species; support state management.

FWP Response: FWP intends to comprehensively manage wolves in a manner comparable to other managed species. Montana has a successful history of wildlife management and expects wolf management to be no exception.